

**UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND**

JUDY JIEN, *et al.*,

Plaintiffs,

v.

PERDUE FARMS, INC., *et al.*,

Defendants.

Civil Action No. SAG-19-2521

**PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT
WITH AGRI STATS, INC. AND APPROVAL OF NOTICE AND PLAN OF NOTICE**

Pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, Plaintiffs Judy Jien, Kieo Jibidi, Elaisa Clement, Glenda Robinson, Emily Earnest, and Kevin West (collectively “Plaintiffs”) hereby move for an Order granting preliminary approval of the settlement reached between Plaintiffs and Defendant Agri Stats, Inc. (“Agri Stats”). The settlement terms are memorialized in a written agreement entered into by the parties on September 25, 2025 (“Settlement Agreement”). Plaintiffs also move for an Order granting approval of Plaintiffs’ proposed notice and plan of notice

Plaintiffs respectfully request that the Court:

- a) Grant preliminary approval of the Settlement Agreement;
- b) Certify the proposed Settlement Class;
- c) Appoint the Named Plaintiffs in this litigation—Judy Jien, Kieo Jibidi, Elaisa Clement, Glenda Robinson, and Emily Earnest—as class representatives of the Settlement Class;
- d) Appoint the law firms Hagens Berman Sobol Shapiro LLP, Handley Farah & Anderson PLLC, and Cohen Milstein Sellers & Toll, PLLC (which currently serve as Interim Co-Lead Counsel) as Settlement Class Counsel;
- e) Approve Plaintiffs’ proposed notice and plan of notice; and
- f) Grant a stay of all proceedings in this litigation against the Released Parties (as defined in the Settlement Agreement) except as necessary to effectuate the Settlement Agreement or otherwise agreed to by the settling parties.

This motion is made on the grounds that the Settlement Agreement, which provides substantial injunctive relief to the class, is fair, reasonable, and adequate, thereby satisfying the requirements of Rule 23(e) of the Federal Rules of Civil Procedure. Furthermore, the notice that

Plaintiffs propose is clear and gives class members a fair and adequate opportunity to challenge or otherwise respond to the proposed Settlement Agreement, and therefore also satisfies the requirements of Rule 23(e).

This motion is based on the Settlement Agreement; the Memorandum in Support of Motion for Preliminary Approval of Settlement with Agri Stats, Inc. and Approval of Notice and Plan of Notice; and the Declaration of Shana E. Scarlett (all three of which accompany this motion).

Dated: October 10, 2025

Respectfully submitted,

/s/ Shana E. Scarlett
Shana E. Scarlett (admitted *pro hac vice*)
HAGENS BERMAN SOBOL SHAPIRO LLP
715 Hearst Avenue, Suite 202
Berkeley, CA 94710
Tel: (510) 725-3000
shanas@hbsslaw.com
riop@hbsslaw.com

Steve W. Berman (admitted *pro hac vice*)
Breanna Van Engelen (admitted *pro hac vice*)
HAGENS BERMAN SOBOL SHAPIRO LLP
1301 Second Avenue, Suite 2000
Seattle, Washington 98101
Tel: (206) 623-7292
steve@hbsslaw.com
breannav@hbsslaw.com

Elaine T. Byszewski (admitted *pro hac vice*)
Abigail D. Pershing (admitted *pro hac vice*)
HAGENS BERMAN SOBOL SHAPIRO LLP
301 North Lake Avenue, Suite 920
Pasadena, CA 91101
Tel: (213) 330-7150
elaine@hbsslaw.com
abigailp@hbsslaw.com

Dated: October 10, 2025

/s/ Brent W. Johnson
Brent W. Johnson (admitted *pro hac vice*)
Benjamin D. Brown (admitted *pro hac vice*)
Daniel Silverman (admitted *pro hac vice*)
Alison S. Deich (admitted *pro hac vice*)

COHEN MILSTEIN SELLERS & TOLL PLLC
1100 New York Avenue NW, 5th Floor
Washington, DC 20005
Telephone: (202) 408-4600
Fax: (202) 408-4699
bbrown@cohenmilstein.com
bjohnson@cohenmilstein.com
dsilverman@cohenmilstein.com
adeich@cohenmilstein.com

Dated: October 10, 2025

/s/ George F. Farah
George F. Farah (admitted *pro hac vice*)
Rebecca P. Chang (admitted *pro hac vice*)
HANDLEY FARAH & ANDERSON PLLC
33 Irving Place
New York, NY 10003
Telephone: (212) 477-8090
gfarah@hfajustice.com
rchang@hfajustice.com

Matthew K. Handley (D. Md. Bar # 18636)
Stephen Pearson (admitted *pro hac vice*)
HANDLEY FARAH & ANDERSON PLLC
200 Massachusetts Avenue, NW, Seventh Floor
Washington, DC 20001
Telephone: (202) 559-2433
mhandley@hfajustice.com
spearson@hfajustice.com

*Interim Co-Lead Counsel for Plaintiffs and the
Proposed Settlement Class*

CERTIFICATE OF SERVICE

I hereby certify that on October 10, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notice to counsel for all parties that have appeared in this case.

/s/ Shana E. Scarlett _____